

MELINDA HAAG (CABN 132612)  
United States Attorney

MIRANDA BETH KANE (CABN 150630)  
Chief, Criminal Division

JOSHUA HILL (CABN 250842)  
Assistant United States Attorney

1301 Clay Street, Suite 340-S  
Oakland, California 94612  
Telephone: (510) 637-3740  
Facsimile: (510) 637-3724  
E-Mail: Joshua.Hill2@usdoj.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,	)	No. CR-10-0541-CW
	)	
Plaintiff,	)	STIPULATION AND ORDER TO
	)	CONTINUE STATUS CONFERENCE
v.	)	AND EXCLUDE TIME UNDER THE
	)	SPEEDY TRIAL ACT AS TO
JAMIE LYNN SALVO, and DENAE	)	DEFENDANTS SALVO AND
HARTSINCK,	)	HARTSINCK
	)	
Defendants.	)	
_____	)	

IT IS HEREBY STIPULATED AND AGREED between the plaintiff through its attorney, Joshua Hill, and the defendants through their undersigned attorneys that the status hearing presently set for January 31, 2011, be continued to February 9, 2011 at 9:30 a.m. for arraignment on the superseding indictment. This continuance applies only to defendants Salvo and Hartsinck. In addition, the parties continue to review discovery and conduct necessary investigation. The parties agree that the delay is not attributable to lack of diligent preparation on the part of the attorney for the government or defense counsel. For these reasons, the parties request that time under the Speedy Trial Act be excluded based on the need for reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The parties

STIPULATION AND ORDER  
CR-10-0541-CW

1 agree that the waiver covers all time between the date of this stipulation and February 9, 2011.

2 IT IS SO STIPULATED:

3 Dated: January 25, 2011

\_\_\_\_\_  
/S/  
ANGELA HANSEN  
Assistant Federal Public Defender  
*Attorney for Salvo*

6 Dated: January 25, 2011

\_\_\_\_\_  
/S/  
ED SWANSON  
Swanson & McNamara LLP  
*Attorney for Hartsinck*

9 Dated: January 25, 2011

\_\_\_\_\_  
/S/  
JOSHUA HILL  
Assistant United States Attorney

12 **ORDER**

13 GOOD CAUSE HAVING BEEN SHOWN, it is hereby ordered that the hearing in this  
14 matter now scheduled for January 31, 2011 is hereby rescheduled for February 9, 2011 at 9:30  
15 a.m. for arraignment on the superseding indictment only as to defendants Jamie Lynn Salvo and  
16 Denae Hartsinck. Based upon the representation of counsel and for good cause shown, the Court  
17 also finds that failing to exclude the time between January 25, 2011 and February 9, 2011 would  
18 unreasonably deny the government and the defense the reasonable time necessary for effective  
19 preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv).  
20 The Court further finds that the ends of justice served by excluding the time between January 25,  
21 2011 and February 9, 2011 from computation under the Speedy Trial Act outweigh the best  
22 interests of the public and the defendant in a speedy trial. Therefore, it is hereby ordered that the  
23 time between January 25, 2011 and February 9, 2011 shall be excluded from computation under  
24 the Speedy Trial Act. 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv).

26 DATED: January 26, 2011

  
\_\_\_\_\_  
HONORABLE DONNA M. RYU  
United States Magistrate Judge